

INFORMATION ON THE PROCESSING OF PERSONAL DATA IN THE CONTEXT OF WHISTLEBLOWING

KKCG Services a.s. respects the privacy of its business partners, employees and other potential users of its internal whistleblowing system for the protection of whistleblowers and values their trust.

With regard to the fact that personal data may be processed as part of the use of this system, we would like to inform you about the details of this processing and about your rights. We also provide contacts where you can exercise your rights or ask us for more detailed information about the processing of your personal data.

We obtain and process your personal data in accordance with the relevant legal regulations, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) ("**GDPR**") and in connection with the fulfilment of obligations under Act No. 171/2023 Coll., on the protection of whistleblowers ("**ZOOs**"), in particular in connection with the receipt of reports under this Act.

1. IDENTITY AND CONTACT DETAILS OF THE CONTROLLER

The controller of your personal data is KKCG Services a.s., with its registered office at Evropská 866/71, 160 00 Prague 6, Vokovice, ID No. 271 07 744 ("**KKCG**"). In the interest of a thorough investigation of each Notification and in the interest of protecting the whistleblower, KKCG has appointed appropriate persons to receive, assess the reasonableness and verify the substance of the Report. The relevant persons are Tomáš Porupka (tomas.porupka@kkcg.com) and Kateřina Lukášová (katerina.lukasova@kkcg.com). In case of any requests for information on the processing of your personal data or in case of exercising your rights within the meaning of Article 7 below, please contact us at the e-mail address gdpr@kkcg.com.

2. PURPOSES OF PROCESSING AND LEGAL BASIS FOR PROCESSING

As a whistleblower, you have the opportunity to decide what information we will process about you. The provision of your personal data is entirely voluntary and is not a condition for submitting a notification. The processing of personal data always takes place only to the extent given by the specific purpose of processing, namely:

- (a) acceptance, assessment and registration of notifications and performance of other obligations in accordance with the ZOO, based on the legal title of compliance with a legal obligation;
- (b) if it is not a notification within the meaning of the ZOO, we usually process the relevant personal data on the basis of the legal title of legitimate interest in order to properly investigate the report;
- (c) in the event of an ongoing or imminent dispute in the future, on the basis of the legal title of legitimate interest.

3. **PERSONAL DATA OR CATEGORIES OF PERSONAL DATA**

Personal data is processed for the above purposes to the following extent:

- (a) name, surname, date of birth and contact address of the whistleblower, or other data from which it is possible to deduce the identity of the whistleblower (e.g. address, position in the company, etc.), if we know this information;
- (b) name, surname, or other identifying data (e.g. date of birth, address, position in the company, etc.) of the person against whom the report was directed, or of other persons listed in the report, if their identity is known to us;
- (c) the voice recording or minutes of the oral report and the whistleblower's comments thereon, and
- (d) all information necessary to investigate the report.

4. **RECIPIENTS OR CATEGORIES OF RECIPIENTS OF PERSONAL DATA**

Your personal data is processed in accordance with the ZOO by the competent person in charge of investigating the report. The relevant person is obliged by law to maintain confidentiality about all facts that he or she has learned in connection with the submitted report and its investigation. Some personal data (with the exception of the whistleblower's identification) may be disclosed to other persons to the extent necessary for a proper investigation of the report.

To receive notifications, KKCG also uses the FaceUp communication platform of FaceUp Technology s.r.o., ID No.: 06142630, with its registered office at Údolní 567/33, Brno-město, 602 00 Brno. If you submitted a notification via the FaceUp platform, you had to confirm by ticking the box that you had read their Information on the processing of personal data in connection with the submission of the notification before sending it. If you have submitted a notification in another way, we recommend that you also familiarize yourself with this Information, because the FaceUp platform is used to record all notifications received (regardless of the method of their submission), all communication that takes place through the FaceUp platform is encrypted.

In cases stipulated by law, KKCG is obliged to disclose personal data to authorities and state administration bodies supervising in accordance with the relevant laws. In accordance with the ZOO, we will inform you in advance of such a transfer, including the reasons for such sharing.

5. **TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES**

As part of the processing of personal data through KKCG's internal whistleblowing system, personal data is not transferred to third countries.

6. **PERIOD OF STORAGE OF PERSONAL DATA**

In accordance with Article 2 above, we will only process your personal data for as long as is necessary to fulfil the purpose of the processing. In accordance with the ZOO, on the basis of the legal title of compliance with the legal obligation, the relevant person is obliged to keep the notification within the scope of Article 3, letters a) to f) submitted through the internal notification system under the ZOO for a period of 5 years from the date of receipt of the notification.

In addition to the above (and only in the case of a notification outside the ZOO regime), personal data relevant to the resolution of a potential dispute will be processed on the basis of a legitimate interest, no longer than ten years from the decisive event for the running of the limitation period in a specific case. In the event of an ongoing dispute, for the duration of the dispute until it is settled.

Once the purpose of processing has been fulfilled, your personal data will be securely deleted.

7. RIGHTS OF THE DATA SUBJECT

If you have given your consent to the processing, you have done so voluntarily and you have the right to withdraw or restrict this consent at any time by contacting the contact details listed in Article 1.

If your personal data is processed on the basis of KKCG's legitimate interest, you have the right to object to the processing at any time.

Your other legal rights include:

- Right to request access to personal data
- Right to rectification or erasure of personal data
- Right to restriction of processing
- Right to data portability
- the right to lodge a complaint against KKCG as the controller with the Office for Personal Data Protection.
- You also have the right to lodge a complaint against the processing of your personal data with the Office for Personal Data Protection, www.uoou.cz, with its registered office at Pplk. Sochora 27, 170 00 Prague 7.

However, the exercise of these rights may be subject to additional terms or conditions. With regard to the ZOO, some of the above-mentioned rights may be restricted, in particular the right of access to personal data, due to the legal obligation to protect the identity of the whistleblower and other persons listed in the report so that there is no potential obstruction of the investigation of the reported information, in accordance with Sections 11 and 6 (1) of the Act. 2 of Act No. 110/2019 Coll., on the Processing of Personal Data.

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